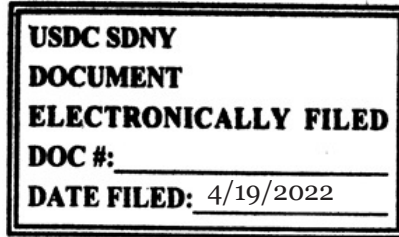




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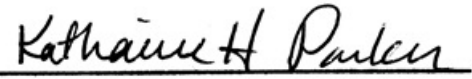
New York | Washington D.C. | San Francisco | San Diego | Nashville | Baltimore

April 11, 2022

VIA ECF

The Honorable Katharine H. Parker
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.
4/19/2022

Re: *Robinson v. De Niro and Canal Productions, Inc.*, No. 1:19-cv-09156 (LJL) (KHP)

Dear Judge Parker:

This firm represents Plaintiff Graham Chase Robinson. Plaintiff will be filing a letter motion seeking a pre-motion conference to continue Defendant Robert De Niro's deposition and compel deposition answers. In connection with that letter motion, Plaintiff will need to provide the Court with copies of Mr. De Niro's deposition transcripts and will need to provide excerpts from Mr. De Niro's deposition transcripts as part of her letter motion.

Mr. De Niro's testimony was taken last week on April 4 and 5, 2022. Pursuant to Paragraph 1 of the Stipulation and Protective Order in this case, the deposition transcripts are to be temporarily treated as confidential for a thirty (30) day period (until May 4 and 5, 2022) to enable Mr. De Niro to identify his specific confidentiality designations. *See* Dkt. No. 23. Defendants have not yet identified to Plaintiff their specific confidentiality designations.

Accordingly, pursuant to Section III of this Court's Individual Practices in Civil Cases, Plaintiff respectfully requests that the Court allow Plaintiff to file the deposition transcripts under seal and to redact deposition excerpts from her letter motion to afford Defendants with time to identify to the Court the portions of the transcripts and/or letter motion that they contend should be redacted from the public record. Defendants consent to this request.

We appreciate the Court's consideration of this request.

Respectfully submitted,


Alexandra Harwin